

EDEN PROJECT SAFEGUARDING POLICIES, PROCEDURES AND GUIDELINES

Including

Eden Project Safeguarding Policy

Disclosure and Barring service Policy page 34

Missing Vulnerable Persons Protocol page 39

Adults at Risk Policy page 43

Professional Boundaries Policy page 46

“if you see something, say something”

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Date 13/05/2021

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If nobody is available **call Control on 1948**, they will contact a safeguarding officer

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POLICY

Introduction

As a charity we are obliged to act according to the principals of the Children Act 2004. Eden Project will endeavour to safeguard children and adult at risk by providing safe, enjoyable activities and opportunities. As an organisation we have a duty of care and a moral obligation to protect people from abuse.

This policy has been developed in accordance with the principles established by the NSPCC, **The Children Act 2004**, and **Working Together to Safeguard Children 2018**, **Safeguarding Vulnerable Groups Act 2006**, **Keeping children Safe in Education 2020**

This policy is mandatory for all staff and its aim is to;

- Protect children and adults at risk partaking in Eden Project activities.
- Assure teachers, carers and parents that children and adults at risk are safe when visiting the Eden Project.
- Raise awareness amongst all staff, so that they know what to do if they are concerned about a child or a adults at risk
- Protect staff by giving practical, common sense, guidelines to avoid placing themselves in situations where they are open to allegations.
- Protect the organisation, by showing that we have taken 'all reasonable steps' to provide a safe environment for everyone.

All staff including those who do not have a specific role working with young people, have a duty to safeguard and promote the welfare of children and adults at risk.

All staff will be made aware of the policy and the supporting procedures. They will be clear on their responsibility to report all concerns to the designated Safeguarding Officer. The Safeguarding Officers will receive regular training and support for this role.

Definitions

For the purpose of The Safeguarding Policy and Procedures for Eden Project: **Safeguarding** is the process that aspires to keep all children and adults at risk safe from harm, accidents and crime, promoting their mental and physical health, wellbeing and development.

Abuse is a selfish act of oppression and injustice, exploitation and manipulation of power by those in a position of authority. This can be caused by those inflicting harm or those who fail to act to prevent harm. Abuse is not restricted to any socio-economic group, gender or culture.

Adult at Risk of harm

Individuals aged 18 years or over; who may need community care services for reason of mental health issues or other disabilities, age or illness; who may be unable to take care of themselves, or unable to protect themselves against significant harm or exploitation.

Child Protection is ensuring that children are safe from abuse and neglect. child protection covers individual children identified as either suffering or at risk of harm.

A Child is defined in the Children Act 1989 as anyone **under the age of 18**.

Staff are those employed on a contract of employment at Eden Project **including those working on a voluntary/unpaid basis.**

Clients are people that have been enrolled on a specific project that is being delivered by staff.

Visitors are people who have paid to visit the Eden Project

Policies are a guiding principle used to set direction in an organization.

Procedures are a series of steps to be followed as a consistent and repetitive approach to accomplish an end result.

Guidelines provide background information to help you make informed decisions about policies and procedures.

Context of the policy

The Safeguarding Policy is supported by the following Eden Project Policies:

- Health and Safety Policy
- Equality, Diversity and Dignity at work Policy
- Complaints and Grievance Policy
- Disciplinary Policy and Procedures
- Missing Vulnerable Persons Protocol (included)
- Disclosure and Barring Service Policy and Procedure (included)
- Computer use ground rules policy
- Adults at Risk and Professional Boundaries Policy (included)
- Whistleblowing Policy
- Data Protection and Data Retention Policies

Eden Project supports Every Child Matters 2003. These are the five outcomes;

- 1) Be healthy.
- 2) Stay safe.
- 3) Enjoy and achieve.
- 4) Make a positive contribution.
- 5) Achieve economic well-being.

Policy statement

Eden Project is committed to promoting the safety and welfare of all children and adults at risk by adopting this Safeguarding Policy, Procedures and Guidelines for Eden Project.

This policy applies to all children and adults at risk, whatever their age, culture, disability, gender, language, racial origin, religious beliefs and/or sexual identity.

All suspicions and allegations of abuse will be taken seriously and responded to swiftly and appropriately.

All staff will be aware of their responsibility to report any concerns however small. This applies to all staff, the Board of Trustees, volunteers, students and anyone contracted to work on our behalf.

We are committed to reviewing our policy and procedures every year, in light of changes in relevant legislation, or following a significant incident.

Role of the Designated Safeguarding Officers - Policy

Key functions of the Designated Safeguarding Officers are:

- To receive and manage all reports of incidents, allegations or suspicions of abuse or poor practice.
- To pass reports and concerns to the:

Multi Agency Referral Unit - 0300 1231 116
- To take advice from the Cornwall Safeguarding Board, NSPCC and the Government.
- To manage allegations in a professional confidential and fair way.
- Inform the Senior Management Team and head of Human Resources about any action taken and any further action required.
- Ensure that proper records, of any referral and action taken are kept safely and in confidence, see **Appendix A, Incident Report Form** page 29, and guidance on **Retention of records** page 20.
- Advise and assist the Human Resources Team in Safeguarding training, ensuring that the policy is accessible.
- To monitor and review the Safeguarding Policy and our practice across the organization regularly to ensure that we comply with current best practice.
- To share information and training about Safeguarding with staff, volunteers, children and parents.

General Health and Safety for events – Policy

It is our duty and legal obligation to ensure that we reasonably ensure that we do everything we can to ensure that events are safe and well managed.

All activity and events should have at least one member of staff leading on Safeguarding, raising awareness of the policy and guidelines among other staff, external staff, parents, children and adults at risk.

For further information refer to **General Health and Safety for events** page 8, and the **Missing vulnerable Persons Protocol Appendix F**, page 39

Reporting allegations: Staff responsibility – Policy

The welfare of children and adults at risk is paramount and abuse apparent, actual or suspected it must be reported. Even if the truth of the disclosure is uncertain, an appropriate response has to be made.

It is not the responsibility of any member of staff to decide whether or not abuse or poor practice is actually taking place.

Staff should never try to deal with a suspicion, allegation or actual incident of abuse themselves. The incident should be reported immediately to the Designated or Deputy Safeguarding Officer.

See **Contact details** page 2

Staff should accurately record details on the **Incident Report Form Appendix A**, page 29, with no reference to personal opinions.

Staff should maintain confidentiality. Allegations must not be discussed as any breaches could be damaging to the investigation which may follow.

Staff should be vigilant and aware of signs of abuse, see **Recognition of Abuse**, page 24, as a guide. Refer to **Dealing with suspicions and allegations** page 11, when dealing with an allegation or incident.

If you see something, say something.

Images and media – Policy

It is important to minimize the risk of anyone using images and films of children in an inappropriate way.

Children, parents and carers have a right to decide whether their images are taken and how they may be used. We will always use our **Image consent form** when recording images. See **Appendix B**, page 32

Some activities take place in the public realm and where it is not possible to control all photography and filming. Any concerns about inappropriate or intrusive photography or filming, or about the use of images, should be challenged, safely, reported to the Designated Safeguarding Officer and treated in the same way as any other Safeguarding concern. Parents and public should be prepared to identify themselves if requested and respectfully asked to state their purpose for photography/filming.

For **Image and media Procedures** see page 14

For the **Image consent form** please see **Appendix B**, page 32.

E safety – Policy

Eden Project has a duty of care to protect people who make use of information technology as part of their involvement with us. We will ensure that, as an organisation, we operate in line with our values and within the law in terms of how we use information technology.

Eden Project will use our procedures to deal firmly, fairly and decisively with any examples of all inappropriate ICT use, complaints or allegations; (including breaches of filtering, illegal use, cyberbullying, or use of ICT to groom a child or to perpetrate abuse).

If Eden has reasonable suspicions that criminal activity is or has taken place then more detailed monitoring will occur without notice to the individual concerned.

In line with Eden Project's Safeguarding Policy, the ICT team reserves the right to carry out routine checks on network storage and recall any mobile device that contains Eden Project data to carry out an inspection / audit to ensure that the content is in compliance with our policies and the law.

Please refer to **Image and media** policy page 14 and **Appendix B**, page 32

Guide to teaching online – Policy

Before starting an online lesson, remind the group:

It is not acceptable for anyone (including staff) to record visual or audio content, take screen shots or videos or share private information without documented permission.

Personal details; such names of pupils, schools and any contact details will not be recorded or reproduced on any platform.

Eden Project staff must seek school and or parental permission before they contact any young people on line.

Eden Project staff must only communicate with school pupils during school hours and through professional Eden platforms, staff personal accounts should never be used or their details made public.

Two adults should always be present online, the adult responsible for the group (i.e. acting in Loco Parentis) should never leave Eden staff alone with young people.

Care must be taken if the young people are in an informal education setting; each case will be different please refer to the Lead Safeguarding Officer.

Any disclosure of online abuse will be dealt with in the same way as a face to face disclosures.

If you are unsure about the safety of the app platform or site you are using refer to Net Aware for up to date information. <https://www.net-aware.org.uk>

Acting in Loco Parentis – Policy

In the event of parents leaving minors in our care for any period of time, we take on a higher level of legal responsibility and are acting in “loco parentis”. In a UK legal context means, ‘in place of the parent’. The acting leader should exercise the same care and skill in terms of caring for that child as if for their own children. All activities should be specifically risk assessed and cleared by the Site Safety Officer. It is good practice to agree a code of conduct and rules for the group.

For **General Health and safety for events** procedures please see page 13.

For **Parental Consent Forms** please see **Appendix C**, page 33.

PROCEDURES

Dealing with suspicions and allegations

All members of staff have a duty to report any concerns to a member of the safeguarding team, however small. For **Contact Details** see page 2.

The will follow the procedure summarised on page 12.

Responding to an allegation by a child – Procedures

Children and adults at risk who are being abused will generally only tell people they trust and with whom they feel safe. By listening, and taking it seriously, you will already be helping to protect them.

Record exactly what has has said to you and complete the **Incident Report Form Appendix A**, page 29, as soon as possible. Include all the details, record the facts and do not give opinions. Refer to Guidance for Responding to an allegation see page 22.

Responding to allegations against staff – Procedures

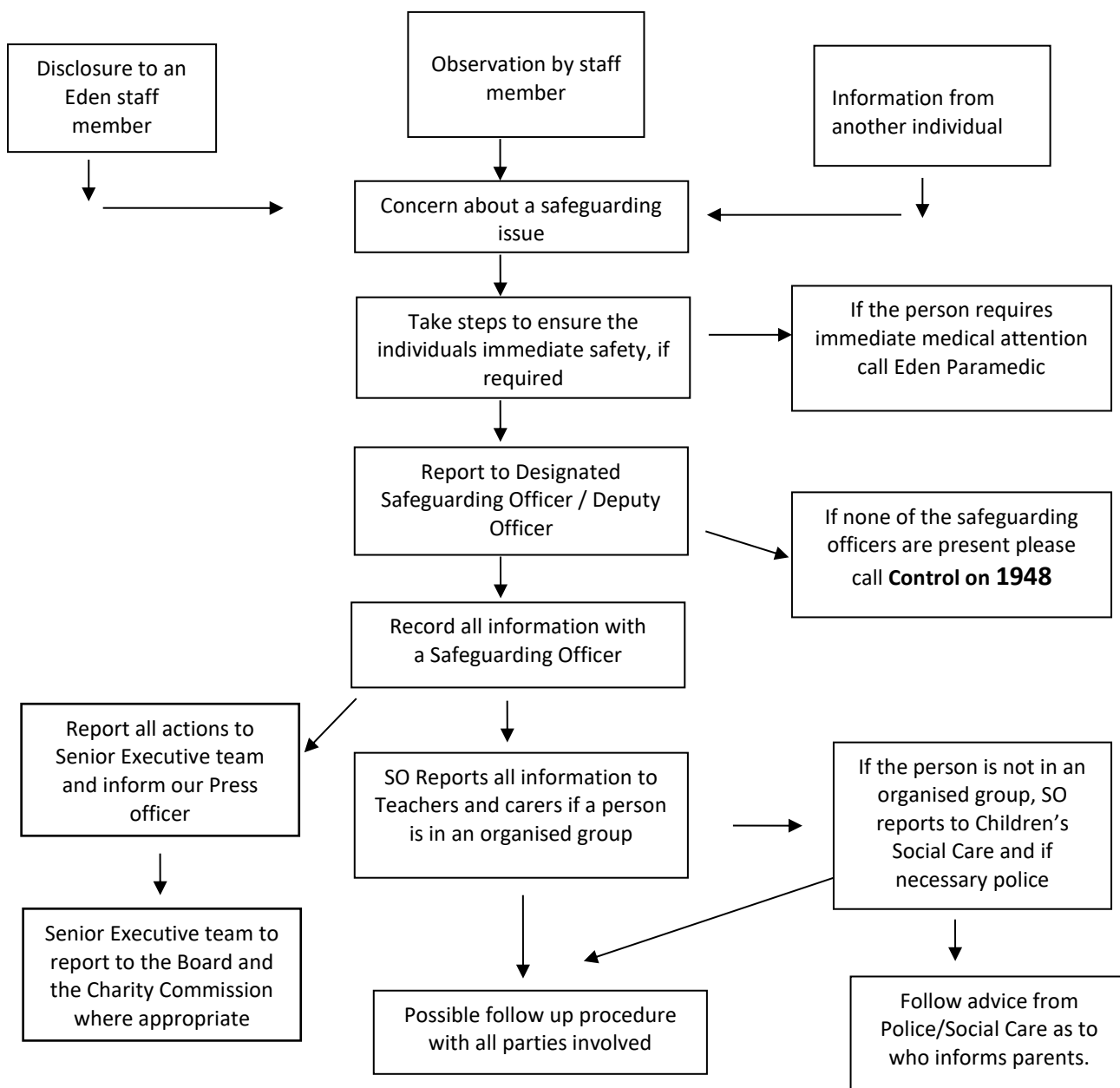
If you become aware of a safeguarding allegation, poor practice or any other suspicious behaviour. Record what has been observed and complete the **Incident Report Form Appendix A**, page 29, as soon as possible, stick to the facts and do not give your opinions.

Responding to concerns about a member of staff

Start by speak to the member of staff about your concerns and listening to what they have to say. If appropriate refer them to our Mental Health First Aid Team and if you are worried about their safety talk to a Safeguarding Officer.

Inform the Designated Safeguarding Officer or a Deputy Safeguarding Officer **Contact details** page 2 so that the individuals can be protected and you can gain some support yourself in what could be a difficult situation.

Reporting concerns about a safeguarding issue – Procedures



- If the concern involves a member of staff or child, follow procedure above and report to Eden’s Safeguarding Officer .
- If the concern involves a by a teacher/group leader/parent/carer, follow the procedure above and an Eden Project Safeguarding Officer will report to the Safeguarding Officer for the school/group.

Supporting members of staff who have had allegations made against them – Procedures

Eden Project has a duty of care to all staff team and should act to minimise the stress inherent in the allegations and disciplinary process.

Individuals will be informed of concerns or allegations as soon as possible and be told the likely course of action; unless there is an objection by Social Care or the Police. They will be given access to welfare counselling or medical advice through our partners Simply Health

When employees are suspended they must be kept informed of both the progress of their case and developments occurring in the workplace.

Social contact with colleagues and friends should not be precluded except where it is likely to be prejudicial to the gathering and presentation of evidence. This will be made as a joint decision with appropriate bodies and taking in to account internal requirements. Where suspension takes place, all contact with Eden will happen through the Human Resources team in the first instance.

When an employee returns to work following a suspension, or at the conclusion of a case, planned arrangements should be made to facilitate their reintegration. This may involve informal counselling, guidance, support, reassurance and help to rebuild confidence in their role.

General Health and Safety for events – Procedures

Please refer to **General Health and Safety for events** information page 8.

- Appoint a designated leader, responsible for supervision, welfare, safety and behaviour of the group at all times.
- All activities must be risk assessed and checked by Eden's Safety Officer. Refer to our **Health and Safety policy**, our **Image and media guidance** page 9, **Appendix B**, page 32 and if appropriate our **Loco Parentis policy** page 9, and **Appendix C**, page 33.
- Ensure the Duty Manager and the Education Team are notified about all events and activities involving young people and adults at risk.

- Leaders are responsible for briefing other members of staff, carrying a list of the children in their group, and that older children (12+) exploring in small groups should have regular rendezvous points.
- If an incident arises, follow on-site emergency procedures. Contact a Duty Manager immediately.
- If there are any medical incidents, contact the Duty Manager.
- If possible all groups should be met, given an introduction to Eden which includes a health and safety briefing, and a base.

It is not safe practice to:

- Spend time with people at risk alone and away from others.
- Take people at risk alone on car journeys, however short.

If these situations are unavoidable, you should have a DBS check and it should be done with the full knowledge of the adult acting in loco parentis, carer, your manager or a Safeguarding Officer.

Image and media – Procedures

Please refer to our **Image and Media policy** page 9 for information.

Key principles to bear in mind:

- Ensure an **Image consent form** has been read, understood and signed by a parent before taking photos or video. Any photographer, member of the press or media should wear identification at all times and be fully briefed regarding his/her behavior and the issues covered by these guidelines.
- Do not allow a photographer to have unsupervised access to children and people at risk or to arrange meeting outside the event.

When publishing images, ensure they are appropriate and don't include anything that enables the subject to be named, contacted or located.

See **Appendix B**, page 32 for an **Image consent form**.

Care must be taken in the storage of and access to images. Eden commits to protecting the rights and privacy of individuals in accordance with the Data

Protection Act 2018 For more information refer to the **Eden Project Data Protection Policy** and **Data Retention Policy**

The use of Webcams and Livestreaming on site – Procedures

The regulations for webcams and Livestreaming are similar to those for CCTV (closed-circuit television). The area in which the webcam is being used must be well signposted and the field of view must be targeted at the activity itself.

The public must know that cameras are being used before they enter the area, in effect, this means Eden Project is getting their consent. However, Eden Project must tell the person:

- Why the webcam is there.
- What we will use the images for
- Who might want to look at the pictures.
- How to contact the Eden Project if they have any questions.

E. safety – Procedures

Please refer to our **Image and Media** policy section page 9.

We will

- Support people using our service to use the opportunities offered by mobile technology and the internet in a way that keeps them safe and shows respect for others.
- Ensure that Eden Project staff follow guidelines for recording images of young people see **Image and media** Policy page 9 and the **Image consent form, Appendix B**, page 32.
- Ensure that any social media tools used are risk assessed in advance.
- Ensure that Eden staff do not deliberately browse, download or upload material that could be considered offensive or illegal. If staff accidentally come across any such material they must report it immediately to a member of ICT Staff or their line manager.

- Eden staff should only contact individuals using Eden Project email accounts (which are monitored as necessary).
- All staff must refer any potential safeguarding issues to the Safeguarding Officer.

Teaching online – Procedures

Please refer to page 9, our **Guide to Teaching** online

To create a safe environment for when teaching online, there are several things you should consider. Whenever possible sessions should be delivered from the Eden Project.

Practicalities

- Switch the settings to have microphones and videos off when joining the meeting.
- Ensure the host is in control of the screen.
- Learn how to mute and unmute all participants, including video screens.
- Be conscious of your backgrounds removing all personal and sensitive material and be aware of others in the room.
- Remind users about respecting others and using the chat box for commentary.
- Dress and talk appropriately.

Acting in Loco Parentis – Procedures

If Eden Project is acting in Loco Parentis Please refer to page 10 for our Policy.

- All members of the team who have regular contact with young people should have a DBS check. See **Appendix D**, page 34.
- A set of rules should be agreed, preferably by the group themselves.
- A ratio of 1:6 for ages 3 to 8 is recommended, 1:10 /15 for ages 9 to 12, 1:15/20 for groups aged 12 to 18.
- Eden Project's staff should work in pairs at all times.
- Eden Project staff should never be alone with a child.
- Eden staff should not administer medicines but should have a record of individuals who have medical conditions - see below.

- Eden staff have the right to refuse entry or send an individual home if they repeatedly break the rules and warnings go unheeded. Or if they arrive unsuitably dressed.
- Eden staff are not responsible for individuals after the advertised session. If an individual is not collected on time their parents / guardians can be asked not to bring their children again.
- If an individual is endangering themselves or others the group leader is entitled to use reasonable force to restore order. The leader mustn't act alone and an assessment of the situation should be made first.
- Parents will be expected to come and collect an individual if they are unwell or a danger to themselves or others.
- These guidelines should be made clear to all parents/responsible adults.

See **Appendix C**, page 33 for **Parental Consent Form**. If externally organised group of young people is visiting the site please refer them to **Appendix E, Health & Safety Notes** page 38.

Organisational procedures

The Eden Project aims to protect children, adults at risk and the Eden Project by adopting the following procedures.

Recruitment of staff

Staff recruited to work with children and adults at risk must be checked for any issues which may give reason for concern. The application pack includes: An application form together with a Role Profile including the nature of responsibility towards children and adults at risk, what skills are expected and what kind of person is required.

All Eden Project staff, must undergo the same procedures to ascertain information such as: past career, relevant interests, any gaps in employment and reasons for leaving, educational qualifications and National Governing qualifications.

Selection of staff

If a job description potentially involves unaccompanied access to a child or adults at risk, the Eden Project will write a specific risk assessment, make relevant background checks, obtain consent for Disclosure and Barring (DBS) checks, and require applicants to disclose any previous criminal convictions, cautions and formal warnings by completing a self-disclosure form. See **Appendix E, Disclosure and barring service Policy** page 34.

A minimum of two references will be taken up, and be from reputable sources followed up by letter or telephone. References should include the person's suitability to work with children and adults at risk. Where a person has worked with children and adults at risk at least one reference should be taken up from that employer.

Acceptable forms of personal identification will be the same as are used for the Disclosure and Barring Service. Effective measures are in place to ensure confidentiality of information held.

Interview and Eden Project Induction

A representative/s from Eden Project will meet each applicant for an interview. The expectations, roles and responsibilities of the job will be clearly clarified.

All new staff will receive an Eden Induction in which they:

- meet key people and find out about Eden's mission and aims.
- sign **Eden Project's Health and Safety** and **Vulnerable Persons Policy**.
- **Eden Project's Equal Opportunities Policy**.
- **Eden Project's Complaints and Grievance Policy**.
- **Eden Project's Disciplinary Policy and Procedures**.
- **Eden Project's Eden's Code of Ethics and Conduct**.
- **Eden Project's Equity Statement**.

- **Eden Project's Safeguarding Policy, Procedures and Guidelines.**
- **Professional Boundaries Policy Appendix I, Page 46**

Training

Awareness training for all staff is mandatory and everyone will complete the online course, Safeguarding at Eden.

The Designated Safeguarding Officer and Safeguarding Officer/s will attend the following training:

- Safeguarding Protecting Children and Adults at risk
- Disability Awareness
- First Aid Training

Retention of records – Procedures

Type of Record	Retention
<p>Safeguarding concerns that Eden Project refers on to Social Care or the Police. Including concerns about physical, sexual, emotional or neglect, disclosures or information from a third party which suggests somebody is being abused; concerns about a parent or another adult, or a young person who has been abused by another young person.</p>	<p>The referral should be acknowledged in writing by Social Care and Eden Project keeps this on file.</p> <p>Records should be kept indefinitely in a secure place.</p>
<p>Welfare concerns that Eden Project decide, after consultation, do not necessitate a referral to children's social care or the police. In such rare circumstances the organisation should make a record of the concern and the outcome.</p>	<p>Personnel files and training records should be kept for 7 years after employment ceases.</p>
<p>Concerns where a member of staff has breached the code of conduct, a record of the behavior, the action taken and outcome should be recorded.</p>	<p>Personnel files and training records should be kept for 7 years after employment ceases.</p>
<p>Disclosure and Barring Service</p>	<p>The actual disclosure form must be destroyed after 6 months. However it is advisable that organisations keep a record of the date of the check, the reference number, the decision about vetting and the outcome.</p>

Records and confidentiality – Procedures

Records should be kept confidential and secure (always locked away with the Human Resources Team), labelled carefully and the keys strictly controlled.

Records should only be shared with those who need to know about suspicions, allegations or actual incidents of abuse.

- The Designated Safeguarding Officer and the Director of Human Resources & Inclusion.
- The parent / carer of the person who is alleged to have been abused.
- The person making the allegation.
- Social Care/Police. If the police are involved then our Visitors Services Manager will be informed.
- The alleged abuser (and parents if the alleged abuser is a child).

A record of all those to whom Disclosures or Disclosure information has been revealed should be kept and it is a criminal offence to pass this information to anyone who is not entitled to receive it.

Destruction of Records

Files for employees convicted of abuse will be kept forever and stored securely and separately when archiving

Data Protection

Eden is fully committed to protecting the rights and privacy of individuals in accordance with the Data Protection Act 1998. For more information refer to the **Eden Project Data Protection Policy and the Data Retention Policy**

GUIDANCE

Responding to an allegation from a child or adult who has become at risk.

For policies on **Reporting Allegations** see page 8

What to do	What not to do
<p>Stay calm.</p> <p>Listen, hear and believe.</p> <p>Give time to the person to say what he or she wants.</p> <p>Reassure and explain that he or she has done the right thing in telling. Explain that only those who need to know will be informed.</p> <p>Act immediately in accordance with the procedure in this policy.</p> <p>Record in writing as near as verbatim as possible what was said as soon as possible.</p> <p>Report to the Designated Safeguarding Officer.</p> <p>Complete the Incident Report Form. (Appendix A, page 26)</p>	<p>Don't panic or over-react. It is unlikely that the child is in immediate danger.</p> <p>Don't probe for more information.</p> <p>Questioning the participant may affect how their disclosure is received at a later date.</p> <p>Don't make assumptions, paraphrase or offer alternative explanations.</p> <p>Don't promise to keep secrets or that everything will be OK (it might not be)</p> <p>Don't try to deal with it yourself.</p> <p>Don't make negative comments about the alleged abuser or add any personal thoughts and opinions.</p> <p>Don't disclose anything to colleagues.</p> <p>Don't make anyone repeat a story unnecessarily.</p>

Good practice in the care of children and adults who have become at risk

– Guidance

All Eden Project staff should demonstrate professional behaviour to protect themselves from allegations of misconduct. The following are common sense examples of how to create a positive culture and climate.

Good practice means:

- Treating all children/ adults at risk equally with respect and dignity.
- Always working in an open environment, maintaining a safe and appropriate distance with children and adults at risk, avoiding private or unobserved situations and encouraging open communication.
- Building balanced relationships based on mutual trust and empowering children and adults at risk to share in decision making.
- Being an excellent role model – this includes not smoking, swearing or drinking alcohol in the company of young people and adults at risk.
- Giving enthusiastic and constructive feedback rather than negative criticism.
- Recognising the developmental needs and capacity of young people and adults at risk.

You should never:

- Engage in rough physical or sexually provocative games.
- Be alone with a child or adult at risk.
- Allow or engage in any form of inappropriate physical contact.
- Allow the use of inappropriate and/or offensive language unchallenged.
- Make sexually suggestive comments, even in fun.

- Allow allegations made by a child or adult at risk to go unrecorded or not acted upon.
- Do things of a personal nature for children or adults at risk that they can do for themselves.
- Invite or allow children or adults at risk to meet outside your professional remit unsupervised.

Incidents that must be reported / recorded:

If a child or an adult at risk is accidentally, seems distressed in any manner, appears to be sexually aroused by your actions, misunderstands or misinterprets something you have done, **report any concerns to the Designated Safeguarding Officer immediately.**

Recognition of abuse – Guidance

It is not easy to recognise where abuse may, or has already taken place. It is acknowledged that Eden Project staff members are not experts and it is not our responsibility to decide whether an incident has taken place, but to report any concerns or an allegation has been made. It is the responsibility of the police/social services to undertake investigations.

Identifying Signs of Possible Abuse

Most children will receive cuts, grazes and bruises from time to time and their behaviour may give reason for concern. There may well be other reasons for these factors, but any concern should be immediately shared with a Safeguarding Officer to assess the situation.

There are a number of ways in which abuse becomes apparent:

- A child or adult at risk discloses abuse.
- Someone else discloses that they believe somebody has been or is being abused.
- A child or adult at risk may show signs of physical injury for which there appears to be no satisfactory explanation.
- A child or adults at risk behaviour may indicate that it is likely that he/she is being abused.

- Unexplained bruising, cuts or burns on the child, or adult at risk particularly if these are parts of the body not normally injured in accidents.
- An injury which a parent or carer tries to hide, or for which they might have given different explanations.
- Changes in behaviour such as the child or adult at risk suddenly becoming quiet, tearful, withdrawn and aggressive or displaying severe tantrums.
- Loss of weight without a medical explanation.
- An inappropriately dressed or ill-kept child or adult at risk who may also be unclean.
- Sexual explicit behaviour, for instance playing games and showing awareness which is inappropriate for the child's age.
- A lack of trust in adults, particularly those who would normally be close to the child or adult at risk.
- A member of staff's behaviour or in the way in which he/she relates to a child or adult at risk, causes concern.

The above signs do not necessarily mean that a child has been abused. However if you are concerned about the welfare of a child or adult at risk, you must act. Do not assume that someone else will.

Definitions of abuse – Guidance

The main forms of abuse:

Physical abuse

Physical abuse can lead directly to neurological damage, physical injuries, disability or, at the extreme, death. Harm may be caused by the abuse itself taking place in a wider family or institutional context of conflict and aggression, including inappropriate or inexperienced use of physical restraint.

Physical abuse has been linked to emotional and behavioural problems and educational difficulties. Violence is pervasive and the physical abuse frequently coexists with domestic violence.

Emotional abuse

Sustained emotional abuse has adverse long-term consequences for children's development to. Impacting on a child's mental health, behaviour and self-esteem it is especially damaging in infancy. Underlying emotional abuse is as important, as other more visible forms of abuse in terms of its impact on the child. Domestic violence is abusive in itself. Adult mental health problems and parental substance misuse may be features in families where children are exposed to such abuse.

Sexual abuse

Sexual is forcing or enticing children and adults who are at risk into sexual activities.

Child sexual exploitation occurs when a child is coerced or groomed into an exploitative situation.

Abuse has been linked to Disturbed behaviour – including self-harm, inappropriate sexualised behaviour, sexually abusive behaviour, depression and a loss of self-esteem. Its adverse effects may endure into adulthood. The severity of impact is believed to increase the longer the abuse continues, the more extensive the abuse, and the older the child. A number of other features of sexual abuse have been linked with severity of impact, including the relationship of the abuser, the extent of premeditation, the degree of threat and coercion, sadism, and bizarre or unusual elements. A child or person at risk's ability to cope with the experience of sexual abuse, once recognised or disclosed, is strengthened by the support of a non-abusive adult carer who believes the child, helps the claimant understand the abuse, and is able to offer help and protection. A proportion of adults and children and young people who sexually abuse have themselves been sexually abused as children and . may have been exposed to domestic violence and discontinuity of care. However, it would be quite wrong to suggest that most children who are sexually abused inevitably go on to become abusers themselves.

Neglect and Self Neglect.

Severe neglect of young children has adverse effects on children's ability to form attachments and is associated with major impairment of growth and intellectual development. Persistent neglect can lead to impairment of health development, and long-term difficulties with social functioning, relationships and educational progress.

People who self-neglect or are neglected may experience low self-esteem through to, in extreme cases, death. The impact of neglect varies depending on how long a person has been neglected, the claimants age, and the multiplicity of neglectful behaviours they may be experiencing.

Bullying and Cyberbullying.

Bullying occurs when individuals or groups seek to harm coerce or intimidate someone who is perceived to be vulnerable and can take place anywhere there is inadequate supervision. It is possible the abuser may be a young person.

Anyone can be the target of bullying, sometimes singled out for physical reasons, appearing vulnerable or belonging to a different race, faith or culture. Bullying is unacceptable behaviour and will be dealt with seriously both in regards to the behaviour exhibited and the reasons for the behaviour.

Domestic Abuse

Domestic abuse is any type of controlling, threatening or violent behaviour between people in a relationship. Exposure to domestic abuse is child abuse.

Female Genital mutilation

Female genital mutilation is the removal or external female genitals for non-medical reasons. It is a dangerous and criminal offence.

Financial or material Abuse

Could occur in cases of theft of money or valuables or when an abuser is using the claimant's money inappropriately. It also includes being a claimant or scams and doorstep crimes

Discriminatory Abuse

Refers to harassment, slurs or unfair treatment relating to race, gender, age, disability sexual orientation and religion.

USEFUL CONTACTS

Contact details

Name: Bran Howell	Education Specialist
Tel: 01726 818832 (24hrs.)	Email: bhowell@edenproject.com
Name: Becky Fenner	Hospitality Manager
Telephone: 01726 811938	Email: bfenner@edenproject.com
Name: Lydia Moss	Duty Manager
Telephone 01726 811955 01726 818780	Email: lmoss@edenproject.com
Name: Tracey Robbins	Head of UK Delivery
Telephone 07976 131070	Email: Trobbins@EdenProject.com

If there aren't any Eden safeguarding officers on duty and you want to report a concern ring; **the Site Safety Team on 1948** who will contact a safeguarding officer

If all else fails call

The; **Multi Agency Referral Unit (MARU)**

on: **0300 123 1116.**

www.supportincornwall.org.uk/kb5/cornwall/directory/service.page?id=pi-Bn9YAMYM

<mailto:MultiAgencyReferralUnit@cornwall.gcsx.gov.uk>

Emergency Duty Team – Out of hours 01208 251300

National Domestic Abuse helpline – 0808 2000 247

Devon and Cornwall Police: 101

Appendix A

Incident Report Form

Name of child or adult at risk

.....

Age and date of birth

.....

Parent/teacher/carer's name

.....

Any relevant medical issues

.....

Home Address (and Phone no. if available)

.....
.....
.....
.....

Holiday Address details

.....
.....

Are you reporting your own concerns or passing on those of somebody else?
Give details.

.....
.....
.....
.....

Brief description of what has prompted the concerns: include dates, times etc.
of any specific incidents

.....
.....
.....
.....
.....

Any physical signs? behavioural signs? Indirect signs?

.....
.....
.....
.....
.....
.....

Have you spoken to the child or adult at risk? If so what was said?

.....
.....
.....
.....
.....

Have you spoken to the parent/teacher carer? If so what was said?

.....
.....
.....
.....

Is anyone identified as the alleged abuser? If so, give details

.....
.....
.....
.....
.....

Have you consulted anybody else? Give details

.....
.....
.....
.....

Your name and position

.....
.....
.....
.....

To whom reported and date of reporting

.....
.....
.....
.....

Signature

Today's date

.....

.....

Please refer to **Retention of Records** Page 20 and **Records and Confidentiality** Page 21

Appendix B Please refer to **Image and Media Policy** page 9.

Eden Project – Image Consent Form

Your child is involved in an Eden Project event. We often take photographs, or make video recordings, of children and young people at the Eden Project or at Eden activities. We may use these images on our websites, social media channels, and in other printed publications, and presentations internally and for the general public.

To comply with the General Data Protection Regulation (GDPR), we need your permission before we can photograph or make any recordings of your child. Please sign, date and return the form.

I give permission for my/my child’s image to be stored and used. I have read and understood the conditions of use on this form:

Subject name: (block capitals)	
Name of parent or guardian if applicable: (block capitals)	
Subject, parent or guardian's signature, if applicable:	
Date:	

Conditions of use

1. We will not use the personal details or names of any child or adult in a photograph on our websites or in any of our printed publications.
2. We will not publish personal e-mail or postal addresses, or telephone numbers.
3. We will not use the name of a child in the accompanying text or photo caption without specific prior permission.
4. We may use group or class photographs or footage with very general labels, such as "Eden workshop".
5. We will only use images of children who are suitably dressed, to reduce the risk of such images being used inappropriately.
6. If images are taken by local press/media, or parents/guests, the Eden Project will not have control of these images.

Please refer to the Eden Project privacy policy for information on how we store and process data responsibly.

www.edenproject.com/privacy-policy

Appendix C

Acting in Loco Parentis, Parental Consent Form

The Eden Project is acting in Loco Parentis, acting in place of a parent of a person under 18 or considered an adult at risk



Childs full name

Child's Date of Birth

.....

Name of the person legally responsible for the child.

.....

Address line 1.

.....

Address line 2.

Postcode

.....

Next of kin and relationship.

.....

Emergency contact name, address and telephone number (1)

.....

.....

Emergency contact name, address and telephone number (2)

.....

.....

GP name and telephone number.

.....

Does your child suffer from any health issues or take any prescribed or over the counter medicines??

.....

Does your child suffer from any allergies? E.g. Food /medication / plants / animals.

.....

Does your child have any dietary restrictions or special requirements?

.....

By signing this you agree that Eden Project staff will be acting in Loco Parentis i.e. providing the reasonable care that a parent would in similar circumstances.

Signature.

Appendix D

Disclosure and Barring Service Policy and Procedure

eden project

This procedure is designed to outline the process for dealing with criminal records and the use of DBS disclosures in recruitment and employment, in accordance with the Disclosure and Barring Service recommendation

Background

The Rehabilitation of Offenders Act, 1974 (ROA) was introduced to ensure that ex-offenders who have not re-offended for a specified period of time since their date of conviction are not discriminated against when applying for jobs. Unless the job they are applying for is exempted, ex-offenders are no longer required to disclose to organisations convictions that are spent.

Posts exempt from the Act include those involving unsupervised access to children, young people, the elderly, disabled people, alcohol and drug users and the chronically sick. These posts will be subject to additional checks via the Disclosure and Barring Service (DBS) to assist us in assessing candidates' suitability for such posts.

Eden Project aims to ensure that it treats all applicants for jobs who have a criminal record fairly and does not discriminate unfairly against candidates with either a spent or an unspent conviction. At the same time the policy aims to safeguard Eden Team members, students, visitors and service users.

Exempted jobs with a requirement for Disclosure

To determine whether a new post has a requirement for Disclosure, a risk assessment should be carried out by the recruiting manager in consultation with the Human Resources Team.

Appendix 1 of this policy lists the range of posts that are currently considered as requiring Disclosure. This list is not exhaustive and may be subject to change in line with legislative and/or Eden's specific requirements. This list is in accordance with the DBS categories and relates to posts:

- working unsupervised with children (i.e. persons aged under 18)
- working with unsupervised vulnerable adults (i.e. persons aged 18 or over who have conditions of the following types: i) a learning or physical disability; ii) a physical or mental illness, chronic or otherwise, including an addiction to alcohol or drugs; or iii) a reduction in physical or mental capacity. Eden also determines individuals who may be in distress as vulnerable.

- working within certain professions.
- Requirement of some funded projects where contact may involve vulnerable participants.

For jobs exempted from the provisions of the ROA, it will be made clear in the vacancy that the post is subject to Disclosure. Candidates will be encouraged to submit appropriate information confidentially to the Human Resources Team. Where a post is exempted from the ROA, the candidate may be asked at interview to discuss any offences.

Because an employee may change roles during employment, it is also a contractual term that if a role requires a DBS check that this must be undertaken, details shared with Eden and the employee must also register for the update service on receipt of their outcome certificate.

Where a candidate is made an offer of employment which is subject to a criminal record check, then a Disclosure application will be made to the Disclosure and Barring Service (DBS). If this shows information that appears to make the candidate unsuitable for appointment, then the applicant will be informed of the reasons in writing. If there is a lack of clarity in the information received or it appears to contradict that previously submitted by the candidate, then s/he will be invited to discuss this before a final decision regarding the appointment is made. Only convictions that are relevant to the person's suitability to perform the job in question will be considered.

Once the DBS is completed, the Team Member will receive a copy of this. They are required to provide a copy of this to the Human Resources Team at Eden on receipt of the document to be held on their personnel file. On receipt of the DBS Certificate, the Team Member MUST register within 30 days for the online update service to ensure future updates in line with the policy are able to be undertaken.

Non-exempted jobs

Applicants are not required to disclose convictions that are 'spent' under the Act. (Cautions, reprimands and final warnings are regarded as spent as soon as they are issued).

The suitability of a person with a criminal record will vary depending on the nature of the job and the circumstances of the conviction. An assessment of the applicant's skills, experience and the nature of the convictions should be weighed against the potential risks associated with the job. In carrying out this risk assessment Eden will take into account the following issues:

- whether the conviction or other matter revealed is relevant to the position in question
- the nature and seriousness of any offence(s) or other matters revealed
- the length of time since the offence(s) or other matters occurred;
- the number and pattern of offences
- the age of the offender when the offence(s) occurred
- what (if anything) has changed since the offending behaviour or other relevant matters took place

- the circumstances surrounding the offence and the explanation(s) offered
- the responsibilities of the position
- the vulnerability of the customer group
- whether the offence has since been decriminalised

If an individual is appointed and it subsequently emerges that they had an unspent conviction that was not disclosed, then this will be treated as a serious disciplinary matter.

Existing Team Members with a criminal record

While DBS Disclosures are primarily used in the recruitment and selection process, it is also possible that an individual's role may change to one which requires a DBS Disclosure. If this process reveals a criminal history, then Eden will assess whether or not this prevents them continuing in their present job or moving to another job. In carrying out this process Eden will examine the factors set out above. In circumstances where, after an appropriate assessment is carried out, it is deemed that they cannot continue in their present job, then Eden will consider re-deployment possibilities.

Rechecking

Disclosures relate only to offences committed at the time of application. However, in line with Eden's responsibility to protect the interests of persons aged under 18 and vulnerable adults, Eden requires Team Members in relevant roles to make subsequent disclosure applications. These will normally be required at intervals of 3 years; although Eden reserves the right to require Team Members to make further disclosure applications at any time. To enable this, employees MUST register for the online update service with DBS to allow a share code to be generated and provided to Eden for the updated DBS to be undertaken.

Training

Eden will ensure that team members involved in leading the recruitment and selection of staff are aware of this policy and its provisions.

Retention and Disposal of Disclosure Information

Storage and Access

Disclosure information will be kept securely, in lockable, non-portable, storage containers with access strictly controlled.

See **Retention or Records** Page 20

Handling

In accordance with section 124 of the Police Act 1997, Disclosure information is only passed to those who are authorised to receive it in the course of their duties.

Usage

Disclosure information may only be used for the specific purpose for which it was requested and for which the applicant's full consent has been given.

Retention

Once a recruitment (or other relevant) decision has been made, Disclosure information will not be kept for any longer than is necessary. This is generally for a period of up to six months, to allow for the consideration and resolution of any disputes or complaints. If, in very exceptional circumstances, it is considered necessary to keep Disclosure information for longer than six months, the DBS will be consulted and full consideration should be given to the data protection and human rights of the individual before doing so.

Disposal

Once the retention period has elapsed, any Disclosure information will be destroyed by secure means, i.e. by shredding. Photocopies and/or other images of the Disclosure or any copy or representation of the contents of a Disclosure will not be kept. However, a record of the date of issue of a Disclosure, the name of the subject, the type of Disclosure requested, the position for which the Disclosure was requested, the unique reference number of the Disclosure and the details of the recruitment decision taken will be retained.

Appendix 1: Posts Requiring DBS Disclosure

The following Eden posts are currently considered as requiring DBS Disclosure. This list is not exhaustive and may be subject to change in line with legislative and/or Eden's specific requirements:

- Team Members working alone with work experience students, but not all Team Members who supervise work experience students
- Schools Team Members
- Paramedics
- Child Protection Officers
- Self Employed Artists (ask the Human Resource team for guidance)
- Projects that involve a considerable amount of time working directly with vulnerable people.
- Finance Team

To determine whether a new role requires DBS disclosure, the line manager, in consultation with the Human Resources Team, should consider:

- Could duties include unsupervised contact with, or access to, persons aged under 18 and/or vulnerable adults

- Could duties involve unsupervised access to, or regular contact with, persons aged under 18 and vulnerable adults in sensitive situations

The DBS also provide guidance regarding which roles are eligible for DBS disclosure. www.homeoffice.gov.uk/DBS-eligibility

Appendix E

General Health and Safety notes for working with External Organisations visiting on site

If an organisation brings a group of young people or adults at risk on site it is their responsibility to look after them. It is our role to ensure that their trip is enjoyable and safe. A member of Eden staff must act as a contact.

- At least one member of staff leads on Safeguarding, raising awareness the group and accompanying staff and parents.
- Eden has a contact number for the group leader who is responsible for supervision welfare, safety and behaviour of the group at all times.
- The organisation carries insurance to run events with young people and adults at risk.
- The staff are qualified and experienced to run events with young people and adults at risk.
- All activities are risk assessed and checked by a member of the Eden Project Education Team.
- Leaders of groups are responsible for briefing other members of the team and they all carry a list of the members of their group. If older children (12+) are being allowed to explore in groups they should have regular rendezvous established.
- Staff from visiting organisations must be made aware that, in the event of an incident or injury, the on-site Eden team must always be contacted. They are equipped with site-wide radio communications and will take appropriate action.
- The organisation has adequate provision for acting in Loco Parentis and Image consent policies where appropriate.

- The Education Team know about the event.
- If possible, all school groups should be met, given an Eden introduction which includes a health and safety briefing, and a base.

For further information contact the education team **01726 811913**

Appendix F

Missing person/Vulnerable person protocol

Ensuring visitor welfare, health and safety and experience

This protocol applies to any vulnerable person (it could be a child, an elderly person, or an adult with difficulties).

The welfare of the vulnerable person is paramount. They can go missing or lose their guardians / parents / teachers / carers on a frequent basis throughout the year. As a staff member, you have equal responsibility for both ensuring their safety and locating the whereabouts of the adult concerned. **In the event that a vulnerable person goes missing or is reported lost**, please follow the correct procedure as detailed below. **In any such case, it is vital that prompt action is taken.**

1. If a vulnerable person is reported missing by a guardian / parent / teacher / carer, the first question that needs to be asked is the last known whereabouts of them and the time.
2. Once the last known whereabouts and the time have been established, obtain a detailed description of the clothing they were wearing.
3. Notify the Duty Manager or Steward Team Leader. When calling on the radio **IT IS VITAL** that the following protocol be used: "Come in Duty Manager"... "Duty manager receiving"... "We are looking for a missing vulnerable"... **NEVER GIVE OUT A NAME OVER THE RADIO**... "s/he

is x-age and wearing... (give any other distinguishing information that you can) and was last seen..."

4. The Duty Manager or Steward Team Leader will then come to your location and co-ordinate the search with other stewards. The guardian / parent / teacher / carer will remain with a steward to ensure that once the vulnerable person is found they can be re-united quickly and efficiently, with minimum distress.
5. Once the vulnerable person has been located, the Duty Manager or Steward Team Leader will announce that they have been re-united and tell all Stewards to stand down.
6. In the event that the vulnerable person (again, suggest we stick to using 'child' here for consistency) is not found within approximately 15 minutes the Duty Manager will consider putting out a tannoy announcement.

It is natural that their guardian / parent / teacher / carer will be frightened and distressed. It is your responsibility to reassure them and let them know that we have a very good procedure in place.

In the event that a child approaches a member of staff the following protocol should be used:

1. It is likely the child will be distressed. Offer reassurance, but do not pick the child up.
2. **IT IS VITAL** to radio another member of staff, the opposite sex from yourself, as quickly as possible.
3. Establish the last known whereabouts of their guardian / parents / teacher / carer and the time.

4. Try to establish a description of the adult – gender, hair colour, clothing
- and how many people are in the party altogether.
5. Radio the Duty Manager or Steward Team Leader... "Come in Duty Manager"...*"Duty manager receiving"*... "I have a missing vulnerable with me"... **NEVER GIVE OUT A NAME OVER THE RADIO.**
6. The Duty Manager or Steward Team Leader will then come to your location to co-ordinate the search.
7. Whilst you are with the vulnerable person keep reassuring him / her and try and keep him / her occupied.
8. Make sure that another member of staff, of the opposite sex, remains with you throughout.

Appendix G

Guidelines for working with Apprentices, staff and work experience students who are under 18.

All members of staff should be aware that staff who have become at risk or are under the age of 18 are covered by our Safeguarding Policy and they should follow the guidelines below.

Appropriate Behaviour and Conduct

Whilst it is important to reassure a person who may be nervous in a new environment, it is important not to be over-familiar. This will help to avoid any misunderstandings. Where possible, avoid being on your own in an isolated or closed environment with a young person.

Travel

If you are giving a lift or travelling with a young or a person who has become vulnerable, ensure that there is a known destination, and check in times with a third party in situations when a young person will be travelling alone with an adult during the placement.

Touch

Where possible avoid physical contact. However, in some cases you may need to touch the person due to the nature of the work being undertaken. If this is the case, it is important to check that they understand why; and that they are comfortable with it. Keep these situations to a minimum and whenever possible, make sure there is another member of staff present.

Staff support

It is recommended that young staff members has a mentor in their team and are aware of the relevant Policies and Procedures.

Appendix H

SAFEGUARDING ADULTS AT RISK OF HARM

1. INTRODUCTION

Eden Project makes a positive contribution to a strong and safe community and recognises the right of every individual to stay safe.

Contact with adults at risk will be varied, we seek to ensure that Eden Project undertakes its responsibilities seriously and will respond to concerns appropriately. The policy clarifies the organisation's expectations and is a framework to support all Eden Project staff in their practices.

2. LEGISLATION

The principal pieces of legislation governing this policy are:

- Safeguarding Vulnerable Groups Act 2006
- Care Standards Act 2000
- Public Interest Disclosure Act 1998
- Mental Health Act 1983
- NHS and Community Care Act 1990
- Rehabilitation of Offenders Act 1974 (No current previous offenders on project, possibility in future and may apply to the more supported volunteers across Eden?)
- Equality Act?

3. DEFINITION

Adult at Risk

Aged 18 years or over; who may be in need of community care services and who is or may be unable to take care, or protect themselves against significant harm or exploitation.

This **may** include a person who:

- Is elderly and frail
- Has a mental illness including dementia
- Has a physical or sensory disability
- Has a learning disability
- Has a severe physical illness
- Is a substance misuser
- Is homeless

4 RESPONSIBILITIES

All Eden Project staff will follow the guidance, and will pass on any concerns to the Safeguarding Team. We all contribute to developing safe practices and promote good practice by acting as good role models.

5. IMPLEMENTAION STAGES

Safeguarding for vulnerable adults will be guided by a range of policies and procedures within the organisation. These include:

- Whistleblowing –
- Health and Safety policy, including lone working procedures, mitigating risk to staff and clients
- Equality, Diversity and Dignity at Work policy
- Boundaries Policy
- Data protection (how records are stored and access to those records)
- Confidentiality clauses
- Staff induction
- Staff training

5. COMMUNICATION TRAINING AND SUPPORT FOR STAFF

Eden Project commits to providing induction, training of Eden Project staff, effective communications and support mechanisms.

6.1 Communications and discussion of safeguarding issues

Through:

Providing a clear and effective reporting procedure.

Team meetings, one to one meetings, (formal or informal).

Encouraging discussion to review policies, procedures and practise.

6.2 Support

Eden Project recognises that some situations where there is risk or actual harm can be stressful for staff. The mechanisms in place to support staff include:

Debriefing support for staff and helping to seek further support e.g. access to counselling.

Staff who have raised concerns will be contacted by the Project Manager within 1 week.

7. REPORTING

The process outlined below details the stages involved in raising and reporting safeguarding concerns at Eden Project.

If you see something say something.

See page 29 **Appendix A**, Incident Report Form

See page 8 **Reporting allegations, Staff Responsibility**
and 11 **Dealing with suspicious allegations**

8. MONITORING

Eden Project will monitor the following Safeguarding aspects:

- Safe recruitment practices
- CRB checks undertaken
- References applied for new staff
- Training – register/ record of staff training on adult at risk protection
- Monitoring whether concerns are being reported and actioned
- Checking that policies are up to date and relevant
- Reviewing the current reporting procedure in place
- Presence and action of designated member of staff responsible for Safeguarding is in post

Appendix J

PROFESSIONAL BOUNDARIES POLICY

Policy and Guidance

Definition

For the purpose of this policy 'The Eden Team' refers to paid staff and volunteers at the Eden Project. 'Clients' are visitors, or people engaged in an project that Eden is running. Please note: individuals from any group can, potential be regarded as 'adults at risk'.

3. SCOPE

This document is part of the Eden Project's, Safeguarding Policies.

This document sets out Eden Project's principles and guidance on professional boundaries with clients and adults at risk.

It is recognised that staff should establish rapport and support clients.

However, they are also responsible for establishing and maintain appropriate professional boundaries.

There isn't a fixed definition of professional boundaries. Our intention is to achieve a standard of acceptable practice, creating clarity and consistency across Eden Project's practises.

This guidance applies to all contact with clients and adults at risk and should be incorporated into day-to-day support practices.

2. RESPONSIBILITIES AND AUTHORITIES

The Line Manager has overall responsibility for ensuring that these guidelines are followed by monitoring team and individual practice.

All members of staff are responsible for maintaining appropriate professional boundaries and for raising any issues or training needs with the Safeguarding Team.

Everyone is responsible for challenging and addressing issues when standards are not being maintained.

3. POLICY

3.1 Working with Clients

These principles are:

Boundaries define the limits of behaviour, enabling staff and clients to engage safely in a supportive caring relationship. Boundaries are based upon trust, respect and the appropriate use of power.

The relationship between staff and clients must focus on meeting the needs of the client. Moving the focus away from meeting client's needs towards the Eden Teams needs is an unacceptable abuse of power.

Members of staff may develop an attachment with a client or adult at risk. While this may be natural, the Team should ensure that this does not lead to a breach of professional boundaries. Team members should discuss such situations their manager as part of their supervision.

3.2 Befriending

Staff must never confuse befriending with friendship.

Befriending a client – which is an appropriate and professional relationship and part of building trust to meet client's needs

Becoming a client's friend –is a relationship that focuses on the needs of both people and potentially an abuse of power.

3.3 Counselling,

Staff must differentiate between being a counsellor and using counselling skills (such as active listening with a non-judgmental approach)

Counselling is not appropriate unless your job description outlines that you have been employed to counsel.

If a client needs counselling, they should be signposted appropriately.

3.4 Providing advice

Advice (beyond your job role) should only be offered to clients when they request it, unless you are concerned about their safety. All concerns should be passed onto a Safeguarding officer.

If you aren't qualified to give advice and/or feel it is not appropriate you should inform the adult at risk, and help them find appropriate support.

3.5 Influence

Staff must not influence an adult at risk with their own beliefs and personal values.

Although morality, religion and politics are common areas of conversation, staff should never promote or impose their own views.

3.6 Approachability

Staff should be approachable, open to fair challenge and criticism, and engage in meaningful dialogue. Clients must not be discouraged from accessing support or from making complaints.

3.7 Privacy

Staff must respect client's rights to privacy, and be sensitive and responsive to any personal and cultural needs.

3.8 Inappropriate Personal Disclosure

Staff should not divulge any personal information about themselves or other staff members.

Refer to the Confidentiality section in our contracts for more details

3.9 Concealing Information from Colleagues about Clients

It is unacceptable to conceal information from colleagues about clients. This is in breach of Eden Safeguarding and Whistle-blowing policies.

- Personal information
- Reports of violent or critical incident/issues
- Safeguarding issues
- Not completing full records of service user interactions

3.10 Touch

Eden Project Team should approach physical contact with care. It should only occur as part of specific work instructions or within professional boundaries and with the client's consent.

Where touching is a part of project delivery, all staff should discuss the subject to ensure consistency and clarity of approach.

Some clients may misinterpret physical contact as affection, or as expressions of favouritism. Staff should be aware of the risk of being misunderstood.

4 GUIDANCE ON IMPLEMENTATION

4.1 Financial relationships

Staff must not enter into any financial relationships with clients specifically by not:

- Entering into financial transactions with clients.
- Lending possessions to clients.
- Giving or accept gifts from clients
- Accepting charitable donations to the project without agreement of the project manager
- Handling money on behalf of clients.
- Becoming a trustees, beneficiaries or executors to the client's wills.

4.2 Relationships and contact with clients within work

Managers must be informed if members of staff know a client outside the professional context.

Manager will discuss the issues around confidentiality and complete a risk assessment. The staff member should not be the key worker.

4.3 Relationships and contact with clients outside of work

Staff should not allow clients or adults at risk to visit/reside in their homes.

- Develop relationships with their relatives or friends.
- Share their personal contact details, or of any colleagues.
- Encounters with clients out of hours should be pleasant, natural and civil. Staff should not approach clients and adults at risk.
- Out of hours contact with client, should not be arranged

4.4 Discussing others

- 'Gossip' or hearsay should not be part of our culture and actively discouraged.
- Staff mustn't share personal details about other staff or clients except issues relating to care and support work
- Where any of the above does occur, the incident must be brought to the attention to the project's line manager as soon as possible.

4.5 Other relationship issues

Staff must not hold or administer medication unless specifically authorised and trained to do so.

Staff should not allow clients to travel in their personal vehicles unless in an emergency situation.

The above guidelines are not exhaustive, staff should avoid opportunities for actual or perceived exploitation of a professional relationship and identified situations should be risk assessed.

5. MANAGING BOUNDARY ISSUES

Staff may unwittingly find their relationship with a client is compromised. The line between good and bad practice may not always be obvious.

Staff should inform their Line Manager and seek guidance from on how to deal with a situation as soon as possible

Other people in your team, who are likely to work with the client must also be aware of where a boundary has been blurred or crossed for two reasons:

They can maintain consistent practice with that client or adult at risk.

To ensure that any action taken is open and transparent.

A record of the incident / situation must be kept; to ensure openness and consistency. Stored in locked cabinet in the client's folder signed and dated.

See **Retention of Records** Page 20

Boundary issues should be discussed within teams on a regular basis, and specific team training or facilitated discussion may be appropriate.

Some events and arrangements may require flexibility so the situation should be 'risk assessed', and agreed with the project manager and a record kept.

This approach should ensure that transparency is maintained and positive risk taking is managed.

Role based risk assessments should be updated by Line Managers to address potential risks to clients.

6. REVIEW AND MONITORING

The Project Manager will be responsible for general monitoring of these guidelines. Transgressions will be reviewed with individual staff members and the lead Safeguarding Officer should be notified.

Significant and/or repeated breaches of this policy will lead to disciplinary action, up to and including dismissal.

CHILD PROTECTION AND SAFEGUARDING POLICY, PROCEDURES AND GUIDELINES FOR EDEN PROJECT

eden project

Name of Organisation:

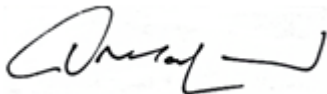
Eden Project

Purpose:

To inform all members of staff of their responsibilities when working with young people

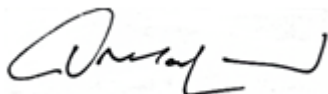
Eden Project has appropriate public liability insurance with no exclusions for child abuse.

Approval of policy and procedures given by:



Date: 18 May 2021

Approval of the safeguarding action plan and its implementation given by:



Date: 18 May 2021

This Policy will be reviewed and in May 2021 and amended if and when national guidelines and policies change.